

STIPULATION AND ORDER

1 The parties hereby stipulate as follows and respectfully request that the Court enter the
2 proposed order set forth below.

3 WHEREAS the parties, Plaintiff Oscar Madrigal Sencion ("Plaintiff"), Defendant Saxon
4 Mortgage Services, Inc., ("Saxon") and Defendant Ocwen Loan Servicing, LLC ("Ocwen"),
5 stipulated to continue the deadline to complete settlement conference to August 15, 2011 which
6 stipulation was approved by the Court; and
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8 WHEREAS, Plaintiff's counsel filed a Motion to Withdraw As Counsel from Plaintiff,
9 that is set for hearing on September 9, 2011;

10 WHEREAS counsel for Plaintiff believes that its relationship with Plaintiff will hinder
11 Plaintiff from having a meaningful and fruitful settlement conference before Magistrate Judge
12 Lloyd; and
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14 WHEREAS counsel for Plaintiff and Defendants Saxon and Ocwen agreed that a
15 settlement conference on August 10, 2011, with Magistrate Judge Lloyd would be unlikely to
16 result in a settlement due to Plaintiff's counsel's pending Motion to Withdraw as Counsel of
17 Plaintiff.
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20 NOW, THEREFORE, the Parties stipulate and agree as follows:

21 1. The deadline to complete the settlement conference shall be continued from August
22 15, 2011 to October 15, 2011. The settlement conference will be held on September 19, 2011, at
23 10:00 a.m., or the soonest time and date thereafter upon which Magistrate Judge Lloyd is able to
24 conduct the conference.
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26 IT IS SO STIPULATED.

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1 Dated: August 5, 2011

CENTURY LAW GROUP, LLP

2 /s/ Rizza Gonzales

3 Edward O. Lear

4 Rizza Gonzales

5 Attorneys for Plaintiff

6 Oscar Madrigal Sencion

7
8 Dated: August 5, 2011

WOLFE & WYMAN, LLP

9
10 /s/ Marcus T. Brown

11 Marcus T. Brown

12 Attorneys for Defendant

13 Saxon Mortgage Services, Inc. and

14 Deutsche Bank National Trust

15 Company, Trustee and Custodian

16 Natixis Real Estate Capital Trust

17 2007-HE Mortgage Pass-Through

18 Certificates, Series 2007-HE2

19
20 Dated: August 5, 2011

HOUSER & ALLISON, APC

21 /s/ Brian Edwards

22 Eric D. Houser

23 Brian S. Edwards

24 Attorneys for Defendant


25 Ocwen Loan Servicing, LLC

1 ~~PROPOSED~~ ORDER

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3 Based upon the foregoing stipulation and good cause appearing, the Court ORDERS that
4 the deadline for the parties to complete a settlement conference with Magistrate Judge Lloyd is
5 hereby CONTINUED to and including October 15, 2011.

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7 IT IS SO ORDERED.

8 Dated: 8/9/11

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10 Hon. Jeremy Fogel
11 United States District Court Judge
12 United States District Court, Northern District of
13 California
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Attorneys for PLAINTIFF

OSCAR MADRIGAL SENCION

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE BRANCH

OSCAR MADRIGAL SENCION, an
individual,

PLAINTIFF,

vs.

SAXON MORTGAGE SERVICES,
INC., a business of unknown form;
OCWEN LOAN SERVICING, LLC, a
business of unknown form; and DOES
1 through 100, inclusive,

Defendants.

Case No.: 5:10-cv-03108 JF

DECLARATION OF SERVICE

PROOF OF SERVICE

Re: Oscar Madrigal Sencion, an individual v. Saxon Mortgage Services, Inc., a business of unknown form; Ocwen Loan Servicing, LLC, and DOES 1 through 100, inclusive

Case No.: 5:10-cv-03108 JF

I am employed in the City and County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action. My business address is 5200 W. Century Boulevard, Suite 345, Los Angeles, California 90045, in the County of Los Angeles.

On August 8, 2011, I served the document(s) named below on the parties in this Action as follows:

DOCUMENT SERVED:

STIPULATION AND [PROPOSED] ORDER CONTINUING DEADLINE TO COMPLETE SETTLEMENT CONFERENCE

SERVED UPON: **SEE THE ATTACHED SERVICE LIST**

[X] **(BY MAIL)** I am readily familiar with the business practice of Century Law Group for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence was placed in the internal mail collection system which is deposited with the United States Postal Service that same day in the ordinary course of business at the practice of Century Law Group, 5200 W. Century Boulevard, Suite 345, Los Angeles, California 90045, in a sealed envelope, postage fully prepaid.

[] **(BY FAX)** The above-referenced document was transmitted by facsimile transmission and the transmission was reported as completed and without error. Pursuant to C.R.C. 2009(i), I either caused, or had someone cause, the transmitting machine to properly transmit the attached documents to the facsimile numbers shown on the service list.

[] **(BY OVERNIGHT DELIVERY)** I am readily familiar with the business practice of Century Law Group LLP for collection and processing of documents for overnight delivery and know that the document(s) described herein will be deposited in a box or other facility regularly maintained by Federal Express or Overnite Express for overnight delivery or by Express mail via the United States Postal Service.

[] **(BY E-MAIL OR ELECTRONIC TRANSMISSION)** Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent to the persons at the e-mail addresses as listed above and/or on the attached Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

[] **(BY PERSONAL SERVICE)** I delivered to an authorized courier or driver authorized by First Legal Support Services to receive documents to be delivered on the same date. A proof of service signed by the authorized courtier shall be filed upon receipt from First Legal Support Services.

[X] **(FEDERAL)** I declare that I am employed in the office of a member of the bar of this court, at whose direction this service was made. I declare under penalty of perjury that the foregoing is true and correct.

Executed on **August 8, 2011** at Los Angeles, California.



Kathy Ferrera

SERVICE LIST

<p>Brian S. Edwards HOUSER & ALLISON 9970 Research Drive Irvine, CA 92618 bedwards@houser-law.com <i>Attorneys for Defendant Ocwen Loan Servicing, LLC</i></p>	<p>Marcus T. Brown WOLFE & WYMAN LLP 2175 N. California Boulevard, Suite 645 Walnut Creek, CA 94696-3502 mtbrown@wolfewyman.com <i>Attorneys for Defendant Saxon Mortgage Services, Inc</i></p>
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